

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**Complaint on Sunday
and Holiday Collections**

Docket No. C2001-1

**DOUGLAS F. CARLSON
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE
(DFC/USPS-1-18)**

May 19, 2001

Pursuant to POR C2001-1/1 and sections 25 and 26 of the *Rules of Practice*, I hereby submit interrogatories to the United States Postal Service.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories.

The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, and tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes, or other recordings.

"All documents" means each document, as defined above, that can be located, discovered, or obtained by reasonably diligent efforts, including, without limitation, all documents possessed by (a) you or your counsel or (b) any other person or entity from

whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

"Communications" includes, but is not limited to, any and all conversations, meetings, and discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

"Relating to" means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material, whether prepared manually, mechanically, or electronically, without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness' responses and should "show what the numbers were [and] what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, please provide an explanation for each instance in which documents or information cannot be provided or have not been provided.

Respectfully submitted,



DOUGLAS F. CARLSON

Dated: May 19, 2001

DFC/USPS-1. Please confirm that, from some collection boxes, the Postal Service sometimes collects and processes outgoing First-Class Mail on some holidays even though the collection-times labels on the collection boxes do not indicate a holiday collection time. If you do not confirm, please explain.

DFC/USPS-2. Please confirm that some collection boxes show a holiday collection time even though, on some holidays, stamped First-Class Mail deposited in those collection boxes prior to the posted holiday collection time will not be cancelled, sorted, processed, and dispatched on those holidays. If you do not confirm, please explain.

DFC/USPS-3. Please provide copies of all documents issued from Postal Service headquarters that guide field offices on the proper circumstances under which holiday collection times should be posted on collection boxes.

DFC/USPS-4. Please confirm that Postal Service headquarters does not issue signs or other preprinted informational notices to post offices for them to use to advise customers, in advance of and on each holiday, whether outgoing First-Class Mail will be collected and processed on the holiday and, if so, the final collection time at the post office on the holiday. If you do not confirm, please provide copies of the signs or other preprinted informational notices.

DFC/USPS-5. Please confirm that Postal Service headquarters does not issue signs or other preprinted informational notices to post offices for them to use to advise customers that the final collection on the day before a holiday will be made prior to the posted collection time for the day of the week corresponding to the day prior to the holiday. If you do not confirm, please provide copies of the signs or other preprinted informational notices.

DFC/USPS-6. For each of the following holidays, please provide information that is as specific as possible to describe the number and proportion of mail-processing facilities nationwide that presently process outgoing First-Class Mail on the holiday:

- a. New Year's Day;
- b. Martin Luther King, Jr.'s Birthday;

- c. George Washington's Birthday;
- d. Memorial Day;
- e. Independence Day;
- f. Labor Day;
- g. Columbus Day;
- h. Veterans Day;
- i. Thanksgiving Day;
- j. Christmas Day.

For purposes of this interrogatory, "outgoing First-Class Mail" refers to First-Class Mail that customers deposit for collection, not, for example, forwarded, return-to-sender, or missent mail. "Outgoing First-Class Mail" does not include mail deposited at a business mail entry unit or other facility designed to accept large mailings that may be presorted or bear permit imprints.

DFC/USPS-7. For each of the holidays described in DFC/USPS-6 for which any mail-processing facilities process outgoing First-Class Mail (as First-Class Mail is defined in DFC/USPS-6):

- a. Please describe the nature and type of communications that post offices receive indicating whether First-Class Mail collected from collection boxes under their jurisdiction will be cancelled and sorted on that holiday;
- b. Assuming the collection boxes do not show a holiday collection time, please explain how post offices determine whether to collect mail from street collection boxes, whether to collect mail from all street collection boxes or only a subset of the boxes, and, if collections will be made, the time at which to collect mail from collection boxes.

DFC/USPS-8. For every holiday in every year from 1987 to present, please provide all documents stating Postal Service policy, guidance, or recommendations for deciding, or establishing criteria for deciding, whether the field offices should or will collect and process outgoing First-Class Mail from collection boxes.

DFC/USPS-9. Please provide all documents explaining why fewer mail-processing facilities cancel and process outgoing First-Class Mail on holidays in 2001 than in years prior to 1988.

DFC/USPS-10. To the extent that information and data are available, for each holiday listed in DFC/USPS-6:

- a. Please identify, for each year between 1986 and the present, every P&DC and P&DF that cancelled and processed outgoing First-Class Mail;
- b. Please provide, for each year between 1986 and the present, the volume of First-Class letters that every P&DC and P&DF cancelled and processed.

DFC/USPS-11. For the Pacific Area and Western Area, please provide all documents explaining why the number of mail-processing facilities that cancel and process outgoing First-Class Mail on holidays, or the number of holidays on which mail-processing facilities process First-Class Mail, dropped between 1997 and 2001.

DFC/USPS-12. Please confirm that the P&DC in Oakland, California, cancelled and processed approximately 250,000 First-Class letters on Memorial Day in 1998. If you do not confirm, please explain.

DFC/USPS-13. Please confirm that the practice of making the final collection from collection boxes on Christmas Eve prior to the posted collection time for the day of the week that corresponds to Christmas Eve has occurred in years other than 1999. If you do not confirm, please explain.

DFC/USPS-14. For Christmas and other holidays, please discuss the extent to which the final collection from collection boxes on the day before the holiday occurs prior to the posted collection time for the day of the week that corresponds to the day before the holiday.

DFC/USPS-15. When a post office, district, or area decides to perform the final collection from collection boxes on the day before a holiday prior to the posted collection time for the day of the week that corresponds to the day before the holiday, does the Postal Service believe that media announcements and other methods of communication

normally used to communicate this information to the public effectively reach every person who may deposit a letter in a collection box before the posted time but after the final collection has, in fact, been made? If so, please explain the basis for this position. If not, does the Postal Service have any concern for the mailer whose mail may be delayed for two to three days as a result of the mailer relying on the posted collection time? Please explain.

DFC/USPS-16. Please provide all documents explaining the Postal Service's policy toward permitting final collections on the day before a holiday to be made prior to the posted collection time for the day of the week that corresponds to the day before the holiday.

DFC/USPS-17. Please provide all documents explaining the guidance that the Postal Service provides to field offices to communicate changes in collection schedules to the public for the day before a holiday when the field offices decide to make final collections prior to the posted collection time for the day of the week that corresponds to the day before the holiday.

DFC/USPS-18. Please provide all documents containing analyses or studies of the adequacy of the current level or any previous level of holiday collection and processing service for First-Class Mail.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

May 19, 2001
Walnut Creek, California